

Presentment Date and Time: June 15, 2017 at 4:00 p.m.
Objection Deadline: June 12, 2017 at 4:00 p.m.

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for the Debtors*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	:	Chapter 11
	:	
Gawker Media LLC, <i>et al.</i> , ¹	:	Case No. 16-11700 (SMB)
	:	
Debtors.	:	(Jointly Administered)
-----X	:	

**NOTICE OF PRESENTMENT OF STIPULATION AND ORDER BETWEEN
THE PLAN ADMINISTRATOR AND CERTAIN RELEASED EMPLOYEES
AND INDEPENDENT CONTRACTORS REGARDING PROOFS OF CLAIM**

PLEASE TAKE NOTICE that each of the claimants identified in Schedule 1 to the stipulation (collectively, the “Employee and Independent Contractor Claimants”) filed proofs of claim (the “Proofs of Claim”) against each of Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. (collectively, the “Debtors”);

PLEASE TAKE FURTHER NOTICE that following good-faith, arm’s-length negotiations between the Debtors and the Employee and Independent Contractor Claimants, the

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.’s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.’s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

parties entered into the stipulation and order attached hereto as **Exhibit A** in respect of the Proofs of Claim (the “Stipulation and Order”);

PLEASE TAKE FURTHER NOTICE that, absent objections, the undersigned will present the Stipulation and Order for signature to the Court on **June 15, 2017 at 4:00 p.m.**; and

PLEASE TAKE FURTHER NOTICE that responses or objections to the Stipulation and Order, if any, shall be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Southern District of New York, shall set forth the basis for the response or objection and the specific grounds therefore, and shall be filed with the Court electronically in accordance with General Order M-399 by registered users of the Court’s case filing system (the User’s Manual for the Electronic Case Filing System can be found at <http://www.nysb.uscourts.gov>, the official website for the Court), with a hard copy delivered directly to chambers and served so as to be actually received no later than **June 12, 2017 at 4:00 p.m.** (prevailing Eastern Time) (the “Objection Deadline”), upon (i) the Plan Administrator for the Debtors, Attn: William D. Holden (profinvoices@gawker.com); (ii) counsel to the Plan Administrator for the Debtors, Ropes & Gray LLP, 1211 Avenue of the Americas, New York, NY 10036, Attn: Gregg M. Galardi (gregg.galardi@ropesgray.com); (iii) the Office of the United States Trustee for the Southern District of New York, 201 Varick Street, Suite 1006, New York, NY 10014, Attn: Greg Zipes & Susan Arbeit; (iv) counsel for the Employee and Independent Contractor Claimants, Saul Ewing LLP, 555 Fifth Avenue, Suite 1700, New York, NY 10017, Attn: Sharon L. Levine and Dipesh Patel; and (v) those persons who have formally appeared and requested service in these cases pursuant to Bankruptcy Rule 2002.

Dated: June 2, 2017
New York, New York

/s/ Gregg M. Galardi
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